

Exhibit B

THE LAW OFFICES OF JOHN F. BAUGHMAN, PLLC
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October 29, 2020

Via Email

Robert Loigman, Esq.
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In re Citibank August 11, 2020 Wire Transfers
No. 1:20-cv-06539 (JMF)

Dear Bob:

I enclose documents with the Bates Numbers Citi00029788 - Citi00029790 and Citi00031168-81 (“Production 15”). As you will see, this production includes “OC Reports.”

In this regard, I want to clarify one thing. In conversation, you have referred to these OC Reports as the “Register.” That is not accurate. Accordingly, for the avoidance of doubt, I point out that we have already produced the Register for the Revlon Term Loan with the reference date of August 11, 2020 (Citi00029489) and we are producing here the Register for the Revlon Term Loan with the reference date of August 12, 2020 (Citi00029789).

We are making this production to you by providing you with access to a File Transfer Protocol (“FTP”) site via email from Arpad Kluczny-Glonski of Mayer Brown LLP. Our production of Production 15 is not an admission or acknowledgement that all or any of the material contained in these documents is relevant to the subject matter of this action, and is without prejudice to Citibank’s right to contend at trial, or in any other subsequent proceeding, that such information is inadmissible, irrelevant, and/or not the proper basis for discovery.

We produce the enclosed materials subject to the objections and limitations set forth in Citibank’s Responses and Objections to Defendants’ First Request for Production of Documents, dated September 3, 2020, and as agreed to by the parties through the subsequent meet and confer process and Judge Furman’s September 15, 2020, order (Dkt. 65). Further, please note that these documents have been marked “Highly Confidential” pursuant to the Stipulated Protective Order, dated September 22, 2020 (Dkt. 81) (“Protective Order”) and should be treated accordingly.

Per our agreement, please confirm in writing in response to this letter that you will withdraw your request to recall Brendan Zeigon for additional deposition testimony.

If you have any questions, please let me know.

Sincerely,

/s/ John F. Baughman

John F. Baughman

The Law Offices of John F. Baughman, PLLC

Counsel for Plaintiff Citibank